

ATTACHMENT A

COUNT ONE

(Violent Crime in Aid of Racketeering Activity – Assault
with a Dangerous Weapon)

On or about August 3, 2020, in Hudson County, in the District of New
Jersey and elsewhere, the defendants,

SHELDON MAYS,
a/k/a “Thottie,”
JERMAINE JENNINGS,
a/k/a “Maine,”
a/k/a “Drill,”
DIVINE ABRAHAM,
a/k/a “Dee,”
JAMIL BOWENS,
JAYLEN BOONE, and
YAHSIER BROWN

for the purpose of gaining entrance to, and maintaining and increasing position
in, the Curries Woods Enterprise, an enterprise engaged in racketeering activity,
did knowingly and purposely assault another, the victim, with a dangerous
weapon, specifically, a knife, contrary to N.J.S.A. 2C:12-1(b)(1), 2C:12-1(b)(2)
and 2C:2-6, and did aid and abet the same.

In violation of Title 18, United States Code, Section 1959(a)(3), and Title
18, United States Code, Section 2.

ATTACHMENT B

I, David Scanlon, am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, videos, photographs, and other items of evidence. The information set forth herein contains information obtained from investigators and other law enforcement officers who have interviewed numerous witnesses and sources, listened to hours of lawfully recorded conversations, and reviewed numerous social media posts. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

The Curries Woods Enterprise

1. At all times relevant to this Complaint, defendants Sheldon Mays, a/k/a "Thottie" ("MAYS"), Jermaine Jennings, a/k/a "Maine," a/k/a "Drill" ("JENNINGS"), Divine Abraham, a/k/a "Dee" ("ABRAHAM"), Jamil Bowens ("BOWENS"), Jaylen Boone ("BOONE"), and Yahsier Brown ("BROWN") (collectively, the "Defendants"), and others, known and unknown, were members and associates of a neighborhood street gang that operated within and in the vicinity of the Curries Woods Housing Complex in Jersey City, New Jersey ("the Curries Woods Enterprise").

2. Individuals who associate with the Curries Woods Enterprise have historically consisted of members and associates of the 52 Hoover set of the Crips street gang. Individuals associated with the Curries Woods Enterprise refer to themselves as "Sharks" or the "Tay Tay Shrimp Gang," which pays homage to Javonte Galbreath, a/k/a "Tay Tay," a member of the Enterprise, who was killed in November 2015, and also use the term "Uptop," referring to their territory. Given the Hoover Crip connection, those affiliated with the Curries Woods Enterprise often wear the colors orange and blue. They also frequently pay homage to Jayden Fondeur, a/k/a "Zero," who was killed in September 2018, and Jordan Herron, a/k/a "23," who was killed in July 2019, both associates of the Enterprise. They are known for violence against rival neighborhood gangs, including individuals who associate with a gang known as Wilkinson/OGM ("Wilkinson/OGM"), as well as for drug distribution in and around Curries Woods.

3. The Curries Woods Enterprise, including its leadership, members, and associates, constitutes an enterprise as defined in Title 18, United States Code, Section 1959(b)(2)—namely, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce.

At all times relevant to this Complaint, the Curries Woods Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of that Enterprise.

4. At all times relevant to this Complaint, the Curries Woods Enterprise, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1)—namely:

- a. acts involving murder, in violation of N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1(a), 2C:5-2, and 2C:2-6; and
- b. offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communication facility to violate the Controlled Substances Act).

Purposes of the Enterprise

5. The purposes of the Curries Woods Enterprise included, but were not limited to, the following:

- a. Enriching the members and associates of that Enterprise through criminal activity, including drug trafficking;
- b. Promoting and enhancing the prestige, reputation, and position of the Enterprise with respect to rival criminal organizations;
- c. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise, through the use of intimidation, threats of violence, and acts of violence, including acts involving murder and assault against, among others, members of rival organizations;
- d. Keeping victims and rivals in fear of the Enterprise and its members and associates; and
- e. Concealing the activities of the Enterprise from law enforcement.

Means and Methods of the Enterprise

6. Among the means and methods by which the defendants and other members and associates of the Curries Woods Enterprise conducted and participated in the conduct of the affairs of the Enterprise were the following:

- a. Members and associates of the Curries Woods Enterprise committed, attempted, and threatened to commit acts of violence, including acts involving murder and assault, to protect and expand their Enterprise's criminal operations;
- b. Members and associates of the Curries Woods Enterprise were expected to carry or have immediate access to firearms and weapons in order to protect themselves, their territory, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the Enterprise;
- c. Members and associates of the Curries Woods Enterprise were expected to participate in criminal activity, particularly violent acts directed at rivals or as directed by the Enterprise's leadership, in order to increase the respect accorded to those members, and resulted in those members' maintaining and increasing status within the Enterprise;
- d. Members and associates of the Curries Woods Enterprise promoted a climate of fear through violence and threats of violence and reprisal;
- e. Members and associates of the Curries Woods Enterprise used and threatened to use physical violence against various individuals, including witnesses and members of rival criminal organizations; and
- f. Members and associates of the Curries Woods Enterprise trafficked controlled substances as a means of enriching themselves.

Membership in and Association with the Enterprise

7. MAYS, JENNINGS, ABRAHAM, BOWENS, BOONE, and BROWN are members and associates of the Curries Woods Enterprise. MAYS, JENNINGS, ABRAHAM, BOWENS, BOONE, and BROWN have outwardly, through use of social media and other means, expressed their membership in and association with the Curries Woods Enterprise.

- a. MAYS, a/k/a "Thottie," utilizes the Instagram handle "bloccbabyfrmda9", which includes mention of "Uptop" and

“Sharks,” referring to the Enterprise, and “#ThottieMacUpk,” referring to his street name “Thottie,” in his Instagram profile. MAYS also utilizes the Facebook handle “SHOOTAH SHELZZ FBG,” and has posted pictures of himself with other members of the Enterprise. For example, in November 2018, there was a photograph of MAYS, ABRAHAM, BROWN, and other members of the Enterprise reposted on MAYS’s Instagram page from ABRAHAM’s Instagram page, which included tags such as “Taught eachother how to swim and hunt,” a blue heart, “Can’t swim with the sharks,” “UPTOP,” and “FOREVERTAYTAY,” all references to the Enterprise.

- b. JENNINGS, a/k/a “Maine,” a/k/a “Drill,” utilizes the Facebook handle “Drill.Tbg,” which references one of his street names. On May 2, 2020, a date notoriously celebrated as 52 Hoover Crips Day, there was a posted video on his Facebook page of JENNINGS, ABRAHAM, and BOONE with the caption, “GANG LIT H52ver Day,” with an orange and blue heart for their gang colors. JENNINGS also has an Instagram account with an associated handle “drill.g,” which likewise references his street name. The profile associated with that account includes “TAY TAY EVERYTHING” referring to deceased Enterprise member Javonte Galbreath, the tag #Zero for deceased Enterprise member Jayden Fondeur, and a blue heart, which is utilized to denote affiliation with the Crips street gang. JENNINGS has also made monetary deposits into commissary accounts of known Enterprise members and has tattoos related to the Enterprise on his neck and arm—specifically, “Zero” and “TayTay.”
- c. ABRAHAM, a/k/a “Dee,” utilizes the Facebook handle “Dee Dank,” which references his street name. On July 2, 2020, there was a photograph of ABRAHAM posted on this account with the caption, “Real Left You Could Tell By My Stance Real Crip Shit.” On March 6, 2020, ABRAHAM is depicted in a photograph with MAYS and JENNINGS, and geo-tagged within the Enterprise’s territory, with the caption “Everybody Points Don’t Matter Who You Get,” seemingly referring to the ongoing violent retaliation with rival gangs. ABRAHAM also utilizes the Instagram handle “dee3_abg,” which likewise references his street name. On March 9, 2019, there was a photograph posted on this account of ABRAHAM, MAYS, JENNINGS, BROWN, and other members of the Enterprise with the caption, “[] Ain’t Making No Moves Or Busting No Plays Get Kicc Out of the Gride.” Crips members traditionally avoid writing “ck” and instead use “cc” as “ck” stands for “Crip Killer.” ABRAHAM has also made monetary

deposits into commissary accounts of known Enterprise members.

- d. BOWENS has an Instagram account with the handle “certified.wipeoutgang.” On April 9, 2020, there was a photograph of BOWENS, BOONE, and JENNINGS posted on his page with the comment, “In The Trenches Feeling Right At Home.” On August 2, 2020, BOWENS was depicted with ABRAHAM and JENNINGS within the Enterprise’s territory in a Facebook video posted on ABRAHAM’s Facebook page with the caption “Wvtts Up” with a purple heart, where purple is the color of the Grape Street Crips.
- e. BOONE has an Instagram account with the handle “gskitbg” and on July 2, 2020, there was a photograph of BOONE, JENNINGS, and ABRAHAM posted with the caption, “We Ain’t Blood, But We Mud Brothers” with a blue heart, which denotes affiliation with the Crips. Also on July 2, 2020, there as a photograph of BOONE and MAYS posted with the caption “Still Posted In These Trenches,” and flashing a large amount of money.
- f. As stated above, BROWN was depicted with MAYS and ABRAHAM in the November 2018 picture of Enterprise members with the tags “TAYTAY,” “UPTOP” and a Shark referring to the Curries Woods Enterprise. Similarly, in March 2019, BROWN was depicted with ABRAHAM, MAYS, JENNINGS, and other members of the Enterprise. In February 2020, Brown was arrested in possession of controlled substances with other members and associates of the Enterprise.

The Rival Gang – Wilkinson/OGM

8. Individuals who associate with Wilkinson/OGM consist primarily of members and associates of the Grape Street Crips or the Sex, Money, Murder set of the Bloods. As set forth below, historically, Wilkinson and OGM were separate neighborhood street gangs, but have recently aligned to retaliate against rival gangs that they share in common. Those affiliated with Wilkinson operate in the area of Wilkinson Avenue, Ocean Avenue, Martin Luther King Drive, and Wegman Parkway in Jersey City, New Jersey, with a primary presence on Wilkinson Avenue between Ocean Avenue and Martin Luther King Drive. Members of Wilkinson frequently refer to themselves as the “Nuski Gang,” which is a tribute to Leander Williams, a/k/a “Nuski,” a member of Wilkinson, who was killed in August 2016. Due to their association with the Grape Street Crips, members of Wilkinson often wear the color purple and utilize hand signs that are associated with the Grape Street Crips. OGM, which stands for “Ocean Getting Money,” initially operated as a separate group within this Wilkinson

area—more specifically, from the area of Bidwell and Ocean Avenues – but have now allied with members of Wilkinson and are operating as one concerted group.

9. The victim is a member of Wilkinson/OGM.

The On-Going Feud with Wilkinson/OGM

10. Beginning at least as early as in or around November 2015, members and associates of the Curries Woods Enterprise began a series of violent, retaliatory exchanges with members and associates of Wilkinson/OGM.

11. As is relevant to this Complaint, on or about April 11, 2018, four members from Wilkinson/OGM (including the victim) assaulted MAYS, a member of the Curries Woods Enterprise. The assault of MAYS was video recorded by the victim and was publicly displayed on social media. During the assault, the Wilkinson/OGM members referred to MAYS as an “opp,” meaning a rival gang member.

12. Since 2018, there have continued to be retaliatory exchanges, including assaults and homicides through shootings and stabbings, between these rival neighborhood street gangs.

13. More recently, seemingly in an effort to gain strength and power against its rivals, Wilkinson/OGM has further aligned with members and associates of another set of the Grape Street Crips that operates in the area of the Salem Lafayette Apartments, a public housing complex in Jersey City, and identify themselves as “SaLaf.”

14. On June 19, 2020, shortly after midnight, ABRAHAM, a member of the Curries Woods Enterprise, was a passenger in a vehicle parked at a gas station near Wilkinson when an individual walked up to the vehicle and fired two gun shots into the vehicle, hitting ABRAHAM in the chest. ABRAHAM survived and two members from SaLaf have been charged federally in connection with this shooting. The very next night, on June 20, 2020, at approximately 12:19 a.m., three unidentified individuals parked near SaLaf, walked into the housing complex, and opened fire into the crowd. Five individuals were shot, including a high-ranking member of SaLaf, who ultimately died from the gunshot wounds he sustained. Approximately two hours later, on June 20, 2020 at approximately 2:20 a.m., unidentified individuals opened fire on a group within the Curries Woods Housing Complex, striking two individuals. Law enforcement recovered 21 spent shell casings at the scene. This investigation is ongoing.

The August 3, 2020 Assault with a Dangerous Weapon

15. On or about August 3, 2020, at approximately 7:52 p.m., MAYS and JENNINGS, both members of the Curries Woods Enterprise, with Individual One and BOWENS, both associates of the Curries Woods Enterprise, arrived at the

area of Martin Luther King Drive and Dwight Street in Jersey City, New Jersey in a black Hyundai sedan ("the Hyundai"). The Hyundai parked. The four occupants got out of the Hyundai and walked down the block. Immediately thereafter, BOONE, ABRAHAM, BROWN and Individual Two, all members of the Curries Woods Enterprise, arrived in a gray Mitsubishi sedan ("the Mitsubishi") and parked directly in front of the Hyundai. The four occupants exited the Mitsubishi and followed the others down the block.

16. Seconds later, as the victim, a member of Wilkinson/OGM, was walking northbound on Martin Luther King Drive with two other individuals ("Individual Three" and "Individual Four"), JENNINGS approached them and spoke with Individual Three and Individual Four, attempting to separate them from the victim.

17. All of the Defendants surrounded the victim. As the victim attempted to walk past BOONE, they pushed each other. The victim then ran north on Martin Luther King Drive and the Defendants chased the victim.

18. As the victim crossed the intersection, he was assaulted by the group. BOONE, MAYS, JENNINGS, ABRAHAM and Individual One repeatedly punched and kicked the victim. During the assault, MAYS brandished a knife and stabbed the victim in his side. Following the stabbing, they continued to assault the victim. Individual Three attempted to intercede to help the victim, prompting MAYS, JENNINGS, Individual Two, BOWENS and BROWN to assault Individual Three.

19. BROWN, BOONE, ABRAHAM and Individual Two then re-entered the Mitsubishi. MAYS, BOWENS, JENNINGS and Individual One re-entered the Hyundai. Both cars then drove away from the area.

20. The victim sustained life-threatening injuries. He was transported from the scene via ambulance and treated at a local hospital.

21. The entire assault, including the stabbing, was captured on Jersey City Police Department closed-circuit cameras ("CCTV") located within the area. Several members of the Jersey City Police Department made identifications of the eight individuals who committed the assault from the CCTV video.

22. Law enforcement reviewed lawfully recorded conversations and text messages obtained from two cellular telephones. MAYS admitted in a lawfully recorded conversation that he and other members of the Curries Woods Enterprise assaulted the victim. In text messages, BOONE and BROWN each admitted to their participation in the group assault of the victim, referring to the victim as a rival gang member from Wilkinson.

